

**IN THE UNITED STATES DISTRICT COURT HARRISBURG, PA  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

JUL 29 2002

WILLIAM CLARK,

**MARY E. D'ANDREA, CLERK**  
Per *[Signature]* **Deputy Clerk**

Plaintiff,

Civil Action No. 01-CV-0764

V.

: (Judge William W. Caldwell)

LARRY LIDGETT, et. al.,

## JURY TRIAL DEMANDED

## Defendants.

**DEFENDANTS' JOINT MOTION FOR  
LEAVE TO DEPOSE PRISONER**

The Defendants, by and through their attorneys, John J. Talaber, Assistant Counsel for the Pennsylvania Department of Corrections, with the concurrence of this James D. Young, Esquire, pursuant to Federal Rule of Civil Procedure 30(a)(2), respectfully request this Court for leave to depose Plaintiff William Clark (AY-5585) within the state correctional system.

Respectfully submitted,  
Office of General Counsel

BY:

John J. Talaber  
Assistant Counsel  
Pa Department of Corrections  
55 Utley Drive  
Camp Hill, PA 17011  
(717) 731-0444  
Attorney No. 83279

Dated: July 29, 2002

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

WILLIAM CLARK,

Plaintiff,

Civil No. 01-0764

v.

(Judge William W. Caldwell)

LARRY LIDGETT, et al.,

Defendants.

**PROOF OF SERVICE**

The undersigned hereby certifies that the Corrections Defendants' Motion for  
Leave to Depose Prisoner was served upon the person(s) in the manner indicated below.

Service by first-class mail  
addressed as follows:

William Clark, AY-5585  
SCI-Rockview  
Box A  
Bellefonte, PA 16823

James D. Young, Esquire  
Lavery, Faherty, Young & Patterson, PC  
The Kunkel Building  
301 Market Street, Suite 800  
P.O. Box 1245  
Harrisburg, PA 17108-1245

*Marilyn Jones*  
\_\_\_\_\_  
Marilyn Jones  
Clerk Typist II

PA Department of Corrections  
55 Utley Drive  
Camp Hill, PA 17011  
(717) 731-0444

Dated: July 29, 2002